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VIA ELECTRONIC FILING



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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59

Dear Ms. Dortch:

Hiya commends the Commission for its continued work with industry stakeholders to combat illegal robocalls. Hiya is revolutionizing the way people make and receive phone calls by providing users with important context, giving them the right information at the right time. One example of how we do this is through our Caller Identification and Robocall Protection services that are available to consumers via apps for Google Android and iPhone, and via partnerships with AT&T, T-Mobile, ZTE and Samsung. Hiya analyzes more than 3.5 billion calls per month in order to protect more than 25 million users from unwanted robo and spam calls globally.

With regard to the FCC's proposed rulemaking last November (*Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59), Hiya is asking the committee to please consider our comments below.

A Challenge Mechanism for Erroneous Blocking

The ability to discern the difference between phone scammers and legitimate callers is a crucial element of quality in the fight against unwanted calls. Robocall blocking solutions should not only be quick to detect spam, but should also be highly accurate. With regard to erroneous blocking, we believe that a challenge mechanism is integral to a healthy call protection system. In many cases, notification by the call



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originators or the intended call recipient is the only visibility that analytics service providers receive into false positive block events. While Hiya agrees with the existence of error notifications, we also recommend that these kinds of insights come by way of providing a lookup functionality where registered call originators can manually check the status of their numbers.

The fact that call originators are given no indication that their calls are being blocked by analytics service providers is a shortcoming of the rushed system. Carriers should be pushed to provide an error code specific to the analytics-driven call blocking event, so that blocked callers have visibility into how this impacts their traffic. We advise the FCC's involvement in supporting the use of standardized error codes so that call originators can have clear insight into why their call was blocked. The STIR/SHAKEN initiative provides us with an example of how this can be done: a new, unique error code has been proposed for call traffic that is intercepted due to failure in attestation.

The Need for Open Communication Channels

Many consumers and analytics companies like Hiya have benefited greatly from the FCC's informal complaint process. Improvements like the new Socrata-driven API access to the FCC complaints database has been tremendous in terms of improving our responsiveness in reacting to complaints. However, to date, the informal complaint process has been geared mainly towards consumers, not businesses.

As far as the best way to rectify erroneous calls, we believe that the most logical solution is to provide calling parties with transparency and access to data surrounding calls being made. As a business, our long-term goal is to provide tools that allow us to collaborate closely with call originators to reduce the information gap and to address issues directly, one on one. We also believe that in the future, access to real time APIs that allow call originators to pass real-time credentials or context into the call may prove to be an effective way of solving the erroneous call blocking problem. We feel that the market is already moving in this direction and that there is no need for it to be regulated.

In terms of providing a guarantee to call originators that their call will no longer be blocked or labelled differently, Hiya must stress that this should



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be at the discretion of analytics companies, who have sophisticated algorithms in place to classify types of calls made by call originators. Just because a call originator requests to be classified in a certain way, there should not be any guarantee that the information will be changed. That said, analytics companies should provide channels to receive feedback from call originators so that a more holistic view of who is calling can be shown to the user. We believe that in lieu of re-classifying a call, adding information (name, reason for call) is just as viable of a solution, especially if there is a dispute about what should be removed.

Finally, to prevent the risk of illegal robocallers exploiting the open communication process as outlined above, we need a solid way to validate number ownership. Once a business starts working with an analytics company to “register” their number, then the challenge becomes validating proof of possession or legal representation. We believe that there is an opportunity for the FCC to step in and aid with this process.

Measuring Effectiveness of Robocall Efforts

As an analytics company, we spend a great deal of time measuring the effectiveness of our own efforts, especially as it relates to the service that we provide for our carrier partners. From our perspective, there is little to no information that voice service providers could disclose with regard to effectiveness without revealing proprietary business information (traffic levels, etc.). Similarly, we don’t think that service providers should be required to report on false positives. Vendors are already competing for the most effective robocall blocking service, and the service that best balances coverage and accuracy will win.

As far as leveraging other data sources to determine overall effectiveness of call blocking, we think that including the FCC’s own Consumer Complaint Data Center as a benchmark for determining the effectiveness of the FCC and industry efforts as a whole is a great idea. Theoretically, if we all do a good job blocking calls, we should see complaint numbers go down.



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Sincerely,

/s/ Jan Volzke

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Vice President, Caller Profiles

